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6 *Attorneys for Plaintiffs Broadcast Music, Inc., Cotillion Music, Inc.,*  
7 *Terry Stafford Music Co., Sony/ATV Songs LLC d/b/a Sony/ATV Tree*  
7 *Publishing, Sony/ATV Songs LLC, and House of Cash, Inc.*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

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11 BROADCAST MUSIC, INC.; COTILLION  
12 MUSIC, INC.; TERRY STAFFORD MUSIC CO.;  
13 SONY/ATV SONGS LLC d/b/a SONY/ATV TREE  
14 PUBLISHING; SONY/ATV SONGS LLC; HOUSE  
15 OF CASH, INC.,

16 Plaintiffs,

17 vs.

18 TRM HOSPITALITY LLC d/b/a LEGENDS  
19 SPORTS BAR & GRILL and JAMES MURPHY,  
16 individually,

17 Defendants.

20 Case No.: 2:20-cv-00309-APG-VCF

21 **PLAINTIFFS' UNOPPOSED  
22 MOTION TO EXTEND DEADLINE  
23 TO RESPOND TO DEFENDANT  
24 JAMES MURPHY'S MOTION TO  
25 DISMISS [ECF NO. 8]**

26 **(FOURTH REQUEST)**

27 Plaintiffs, Broadcast Music, Inc. ("BMI"), Cotillion Music, Inc., Terry Stafford Music Co.,  
28 Sony/ATV Songs LLC d/b/a Sony/ATV Tree Publishing, Sony/ATV Songs LLC, and House of Cash,  
Inc. (collectively, "Plaintiffs"), by and through their counsel, Armstrong Teasdale LLP, hereby move  
pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend the deadline to respond to  
Defendant James Murphy's Motion to Dismiss (ECF No. 8), which was filed on March 4, 2020, by  
an additional thirty (30) days so that Plaintiffs' response would be due on August 5, 2020 (instead of  
the current deadline of July 6, 2020). Undersigned counsel communicated with Defendant James  
Murphy via email on July 2, 2020, regarding this extension request, and Mr. Murphy was in  
agreement to a 30 day extension. This is the fourth request to extend this particular deadline. A

1 hearing is not presently scheduled for the Motion to Dismiss.

2 Good cause exists to extend the deadline for Plaintiffs to respond to the Motion to Dismiss by  
3 an additional 30 days, or to August 5, 2020. In light of the present COVID-19 pandemic prompting  
4 Governor Sisolak to issue numerous Emergency Directives requiring the closure of gaming  
5 operations in Nevada, which included Defendant TRM Hospitality LLC dba Legends Sports Bar &  
6 Grill (“Legends”) as it is a gaming bar and restaurant in Clark County, Nevada, as well as other  
7 issues currently interfering with Legends ability to re-open, Plaintiffs believe that additional time is  
8 appropriate to allow Defendants operations to resume before requiring Mr. Murphy, who is currently  
9 proceeding in proper person, to actively participate in this litigation. Furthermore, the additional  
10 time will allow the parties to continue to discuss settlement of this case, which will eliminate the  
11 need for Plaintiffs to respond to the pending Motion to Dismiss. At present, Plaintiffs are awaiting  
12 Defendants’ response to a pending settlement offer. This request for an additional 30 day extension  
13 to respond to the Motion to Dismiss is made in good faith and is not intended to unreasonably delay  
14 this matter. In particular, this case was recently filed on February 13, 2020, and per the Scheduling  
15 Order, discovery does not close until the end of November 2020 (ECF No. 13).

16 On July 2, 2020, undersigned counsel communicated with Plaintiff James Murphy via email  
17 regarding this extension request. Mr. Murphy was in agreement with Plaintiffs seeking this 30 day  
18 extension.

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Based on the foregoing, Plaintiffs respectfully request that this Court extend their deadline to respond to the Motion to Dismiss by 30 days, or to August 5, 2020.

DATED this 2<sup>nd</sup> day of July, 2020.

## ARMSTRONG TEASDALE LLP

By:/s/Michelle D. Alarie

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Cotillion Music, Inc., Terry Stafford Music Co.,  
Sony/ATV Songs LLC d/b/a Sony/ATV Tree Publishing,  
Sony/ATV Songs LLC, and House of Cash, Inc.*

## ORDER

## IT IS SO ORDERED.

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**UNITED STATES DISTRICT JUDGE**

DATE 7/2/2020

**CERTIFICATE OF SERVICE**

1 Pursuant to Fed.R.Civ.P.5(b) and Section IV of District of Nevada Electronic Filing  
2 Procedures, I certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the  
3 foregoing document was served:  
4

5  via electronic service to the address(es) shown below:  
6

7  via the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first-class  
8 postage prepaid, on the date and to the address(es) shown below:  
9

10 James Murphy  
11 1119 Pinto Horse Avenue  
12 Henderson, NV 89052  
13 [Jhm13@cox.net](mailto:Jhm13@cox.net)  
14 Defendant in Proper Person

15 Date: 7/2/2020

*/s/Simone Ruffin*

16 An employee of Armstrong Teasdale LLP  
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